

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Develop Additional
Methods to Implement the California Renewables
Portfolio Standard Program.

Rulemaking 06-02-012
(February 16, 2006)

**COMMENTS FILED BY THE CENTER FOR RESOURCE SOLUTIONS
ON THE DEFINITION OF A REC UNDER CPUC §§399.11 *et seq.***

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I. Introduction

The Center Resource Solutions (CRS), with the support of the Sacramento Municipal Utility District (SMUD),¹ respectfully offers these comments on the definition of a Renewable Energy Credit (REC) under California's Renewable Portfolio Standard, codified in California Public Utilities Code §§ 399.11 *et seq.*, as amended in 2006 by sections 13 through 19 of SB 107 (the RPS statute).² These comments are submitted subsequent to a stakeholder conference held March 6, 2008 in an attempt to reach a consensus definition of a REC for stakeholder compliance purposes (the Stakeholder Conference).³

Ultimately a consensus definition was not reached at the Stakeholder Conference or in follow-up discussions. This was largely due to disagreement among the parties as to

¹ Although SMUD is not a party to R-06-02-012, it is a party to the Energy Commission's RPS implementation proceeding and other CPUC proceedings related to AB 32.

² All statutory references are to the California Public Utilities Code unless otherwise noted. RECs refer to tradable renewable energy credits used for compliance with California's RPS compliance statute unless otherwise noted.

³ According to PG&E, "The impetus for the conference grew out of a colloquy at the December 10, 2007 Pre-hearing Conference before ALJ Simon wherein it was suggested that such a conference might have been useful among the various stakeholders." See Notice from PG&E that the working group was unable to develop a consensus position, distributed April 25, 2008 (attached as Exhibit A).

whether a REC should be defined to include displaced emissions benefits of renewable energy generation, with CRS arguing that the RPS statute requires a REC to include all environmental attributes, including avoided emissions benefits.

In these comments, CRS and SMUD seek to augment the record by bringing to the Commission’s attention language in the RPS statute that requires RECs to include “all renewable and environmental attributes associated with the production of electricity from the eligible renewable energy resource.” CPUC § 399.12(h)(2), enacted in SB 107 Section 14.

The stated purpose of the RPS statute demonstrates that the Legislature recognized avoided emissions from fossil fuels to be an important environmental attribute of the generation of renewable energy. Furthermore, the history of SB 107 confirms that the Legislature specifically understood the term “environmental attribute” to include avoided greenhouse gas (GHG) emissions associated with the production of renewable energy. Finally, to define RECs as excluding avoided emissions would destroy all GHG reducing benefit of the RPS, which is widely recognized as an instrumental tool in California’s effort to comply with the mandate of AB 32 and fight global warming.

In light of the above, any definition of a REC adopted by the CPUC in this proceeding must include all avoided emissions of carbon dioxide and other GHGs resulting from the generation of renewable energy, at least to the extent renewable energy generation continues to contain such avoided emissions attributes.⁴ A contrary decision, to define RECs to exclude avoided GHG emissions as has been recommended by some

⁴ A state or federal cap on GHG emissions (or similar regulation) could be structured in a manner that eliminates the GHG avoidance benefit of renewable energy. If this were to occur, avoided emissions would cease to be an environmental attribute of renewable energy, and could no longer be included in RECs from renewable energy generated in a regulated region, whether sold for RPS compliance or otherwise.

parties to this proceeding, would be inconsistent with the RPS statute and may be subject to judicial challenge.⁵

Accordingly, CRS and SMUD now submit a proposed definition of RECs that is more consistent with the RPS statute, and which should address the concerns expressed by some of the parties to this proceeding about ambiguities in the current definition.

II. Background

On March 6, 2008 a Stakeholder Conference was hosted by PG&E. The purpose of the Stakeholder Conference was to reach a consensus definition of a tradable REC for California RPS compliance purposes. Specifically, there is disagreement among parties as to whether a REC should be defined to include the displaced emissions benefit (*e.g.* the carbon benefits) that occur when renewable energy is generated and displaces conventional fossil based generation on the grid. The issue of REC attributes was previously raised in comments submitted after the workshop on tradable RECs (the post-workshop comments). In the Request for Post Workshop Comments dated October 16, 2007, the ALJ asked specifically whether a REC should include avoided carbon emissions associated with the conventional generation displaced by the renewable energy generation. *See* ALJ's Request for Post Workshop Comments at 12.⁶ The majority of the parties that submitted comments advised the Commission to exclude GHG emission reduction value from the value of a REC.⁷

⁵ *See Morris v. Williams* (1967) 67 Cal.2d 733, 748 ("Administrative regulations that alter or amend the statute or enlarge or impair its scope are void.")

⁶ CRS and SMUD recognize that some of the points expressed herein might have been expressed in a response to the ALJ's request for post-workshop comments. While CRS is technically a party to this proceeding, it has not been actively involved in this case. We did not become aware of the positions of the parties or the deficiency of the record on these issues until the Stakeholder Conference on March 6, 2008.

⁷ *See e.g.* the post-workshop comments on tradable RECs of Southern California Edison (SCE), San Diego Gas & Electric (SDG&E, Independent Energy Producers (IEP). PG&E initially supported the inclusion of emission reduction value in RECs, but reversed its position on this issue in its reply comments.

Some of the parties argued further that all avoided emissions value should be exclude from RECs so that they could “sell the other attribute (*e.g.*, GHG offset value) to some other entity” while using the REC for RPS compliance purposes. *See* Post-Workshop Comments of SCE at 19; *see also* Post-Workshop Reply Comments of PG&E at 8 (“[Excluding the avoided emission value from RECs] means that if the parties choose to unbundle the RECs from other ‘green attributes’ under a contract, and leave other attributes governed by the contract, they can do so.”)

The comments and other filings submitted by the various parties in the proceeding have largely ignored the mandate of Section § 399.12(h)(2), and the RPS statute generally.⁸ In these comments, CRS and SMUD seek to augment the record on this critical issue.

III. CPUC §§ 399.11 *et seq.* Requires RECs to Include Avoided GHG Emissions

a. Definition of Renewable Energy Credits in 399.12(h)(2)

CPUC § 399.12(h)(2) provides that:

“Renewable Energy Credit” includes all renewable and environmental attributes associated with the production of electricity from the eligible renewable energy resource, except for an emissions reduction credit issued pursuant to Section 40709 of the Health and Safety Code and any credits or payments associate with the reduction of solid waste and treatment benefits created by the utilization of biomass or biogas fuels.⁹

⁸ Two of the parties advocating for the exclusion of GHGs from RECs gave cursory treatment of CPUC § 399.12(h)(2). SDG&E acknowledged that “the language of the current law, added by SB 207, is “arguably vague” on whether it is intended to bundle the GHG attribute with the renewables attribute. SDG&E Post-Workshop Comments p. 19. CRS and SMUD respond that the statute is not vague at all – it clearly requires RECs to include avoided GHG emission reductions. SCE argued that avoided GHG emissions is not an “attribute” within the meaning of 399.12(h)(2) because “an attribute is not created through the non-existence of something.” SCE Post-Workshop Comments p. 17-18. As explained below, this distorts the term “environmental attributes” as it is used in the electricity industry.

⁹ CPUC § 399.12(h)(2), enacted in SB 107 Section 14.

The plain meaning of “environmental attributes,” as the term was and is used in the electricity sector, includes avoided GHG emissions caused by the displacement of conventionally generated electricity via renewable energy generation. For example, the Standard Terms and Conditions for RPS procurement contracts in place when SB 107 was enacted *required* parties selling bundled RECs for RPS compliance to include the following definition of environmental attributes:

“Environmental Attributes” means any and all credits, benefits, **emissions reductions, offsets, and allowances**, howeversoever entitled, attributable to the generation from the Unit(s), **and its displacement of conventional energy generation**. Environmental Attributes include but are not limited to . . . any avoided emissions of carbon dioxide(CO₂), methane(CH₄) and other greenhouse gases (GHGs) that have been determined by the Intergovernmental Panel on Climate Change to contribute to the actual or potential threat of altering Earth’s climate by trapping heat in the atmosphere.¹⁰

Additional evidence that the Legislature intended its reference to “environmental attributes” to include avoided/displaced GHG emissions comes from SB 107, codified at §399.12(h)(2):

(e) “Renewable Energy Credit” means a certificate of proof, issued through the accounting system established by the Energy Commission pursuant to Section 399.13, that one unit of electricity was generated by an eligible renewable energy resource and delivered to a retail seller, the independent system operator, or a local publicly owned electric utility subject to the requirements of subdivision (e). The Energy Commission shall ensure that the **renewable energy credit** includes all renewable and environmental attributes associated with the production of electricity from eligible renewable energy resources, **and**

¹⁰ D. 04-06-014 (emphasis added).

**shall rely on the definition of “renewable energy credit”
adopted as a standard term by the commission.¹¹**

This is explicit direction by the Legislature that it understood SB 107’s reference to “environmental attributes” to include displaced GHG emissions.¹²

**b. Avoiding detrimental environmental impacts of burning fossil fuels is a
stated purpose of SB 107**

The RPS statute expressly states that its intended purpose is to “ameliorate air quality problems throughout the state and improve public health by reducing the burning of fossil fuels and the associated environmental impacts.”¹³ GHG emissions and global warming are “environmental impacts” associated with the burning of fossil fuels, and therefore within the ambit of what SB 107 is intended to reduce.¹⁴

For California’s RPS to meaningfully reduce the burning of fossil fuels, the use of renewable energy in California’s RPS compliance instrument must extinguish the right of anyone else to transfer or claim benefit of the avoided emission from the burning of fossil fuel. If the avoided GHG emissions were allowed to be disaggregated from RECs and sold separately outside the RPS, the entity acquiring those emission reductions would effectively “own” the environmental attributes of the renewable energy generation, since the principle environmental attribute of renewable energy is the avoided emission of fossil fuels. Transferring the avoided emission benefit of renewable energy generation outside the RPS would strip the RPS of all GHG reducing impact – and arguably any meaningful environmental impact as well, since the principle environmental advantage of

¹¹ SB 107 Section 8 as introduced by Senators Simitian and Perata on January 20, 2005, proposing amendment to CPUC § 399.12(e) (emphasis added) (relevant excerpt attached as Exhibit B).

¹² The effect of CPUC § 399.12(h)(2) as enacted is substantially similar to the effect as originally proposed, although express reference to the Standard Terms and Conditions was removed in the initial round of revisions to SB 107.

¹³ CPUC § 399.11(c), as amended by SB 107 Section 13.

¹⁴ See *Mass. v. Environmental Protection Agency*, 549 U.S. ____ (2007)

renewable energy over fossil fuels is that renewable energy is non-polluting. This would contradict the stated purpose of the RPS statute.

It would also be contrary to the executive branch's understanding of the effect of the RPS. Both the Governor's Office and the Energy Commission have expressly stated that the RPS is a critical component of California's fight against climate change:

We intend that our increasing reliance on renewable resources with California and from the western region will help mitigate energy impacts on climate change and the environment.¹⁵

The Energy Commission believes that the most prudent avenue for addressing California's climate change issues is pursuing both a pricing and [RPS] program approach.¹⁶

These expressions demonstrate that California's executive branch views the RPS as a powerful instrument for California in achieving its environmental goals, particularly the reduction of GHG emissions reductions to 1990 levels as required by AB 32. To lose this value through a purported "clarification" would be a travesty.¹⁷

It would also compound the difficulty of the task of the California Air Resources Board (CARB) in complying with the mandate of AB 32. Currently, the RPS is responsible for a large quantity of GHG emissions reductions. To strip the RPS of its environmental and GHG avoiding benefits would effectively raise the bar for CARB – the emissions currently avoided in the RPS would need to be recovered elsewhere. Because of this reality, we find the claim asserted by many of the parties in this

¹⁵ State of California Energy Action Plan II, Implementation roadmap for Energy Policies at 6 (published in October, 2005).

¹⁶ California Energy Commission's Integrated Policy Report of 2007.

¹⁷ A similarly unfortunate result would occur if GHG emission reduction regulations do not protect the avoided emissions value of renewable energy by carving out allowances or through some other device.

proceeding, that aggregating GHG emissions reductions with RECs would complicate CARBs task, particularly unpersuasive.

**c. “Disaggregation” of GHG Attributes from RECs
is Double-Counting**

As noted above, several of the parties to this proceeding would like to change the definition of a REC to allow a single REC (or the underlying unit of renewable energy generation) to be used for both RPS compliance and as a GHG compliance instrument under a prospective GHG regulation.¹⁸ Such a scheme would go against the spirit of the RPS statute’s stricture against double-counting in CPUC § 399.16(a)(2).¹⁹

Furthermore, the prohibition on double-counting or double-use of a single REC is the industry norm. In both the voluntary REC and GHG offset markets and in the majority of RPS compliance markets, it is a widely accepted practice that a single MWh of renewable energy generation may be used for one purpose only—either to comply with a legal mandate (such as RPS), or used in a voluntary renewable energy product, or used in a voluntary GHG offset product. For example, the Green-e Climate Renewable Energy Protocol, which governs certification of GHG emission reduction products sold in voluntary markets in all 50 states, prohibits the sale of a GHG emission reduction product if “[t]he REC or the electricity from which the RECs are derived is being used simultaneously to meet a local, state, or federal renewable energy mandate or other legal

¹⁸ At this time it is uncertain how CARB will treat renewable energy generation in the implementation of AB32. It is unclear whether or not renewable energy generation will be recognized as the basis for a GHG compliance instrument.

¹⁹ CPUC § 399.16(a)(2) provides that a REC shall be counted only once for compliance with the RPS standard of California or any other state, or for verifying retail product claims. Because no GHG emission reduction regulation had been conceived of at that point, the Legislature could not have addressed double counting of renewable attributes for RPS and GHG emission reduction compliance.

requirement."²⁰ Similarly, the Green-e Energy Certification Standard disallows a single REC from being used in a voluntary electricity/REC-only product and for a state RPS. Thus, PG&E's proposal would be contrary to widely accepted industry standards that are used across the United States to govern voluntary REC and GHG offset markets.

d. Tension between the Standard Terms and Conditions and the RPS statute must be resolved in favor of the RPS statute

Several parties to this proceeding cited the definition of "Green Attributes" in the Standard Terms and Conditions, as adopted by the Commission in D. 07-02-011 and modified by D. 07-05-057, as support for the proposition that RECs exclude avoided GHG emissions.²¹ These parties have pointed out that the standard terms and conditions state that Green Attributes "include, but are not limited to: Renewable Energy Credits, *as well as* [a nearly exhaustive list of the environmental attributes of renewable energy created by the avoidance of various emissions]." They argue that this definition of Green Attributes can be read to imply that RECs are exclusive of all environmental benefit, including avoided emissions. As explained above, this interpretation is irreconcilable with the definition of RECs in CPUC § 399.12(h)(2).

We do not believe it was the intention of the Commission, in adopting the Green Attributes definition in D.07-05-057, to redefine RECs to exclude all environmental attributes. D.07-05-057 was a short opinion designed to correct a perceived inconsistency with the text of SB 107, which was represented by the drafter to have been

²⁰ See Green-e Climate Protocol for Renewable Energy Section 4-C, pp. 6-7 available at http://www.green-e.org/docs/climate/Green-e_Climate_Protocol_for_RE.pdf.

²¹ See e.g. the post-workshop reply comments of SDG&E at 9; post-workshop reply comments of PG&E at 7-8.

the result of an inadvertent editing error.²² We suspect the Commission did not anticipate this implication in its choice of words. However, we believe the Commission may wish to consider revising the Green Attributes definition to remove any apparent inconsistency with CPUC § 399.12(h)(2).²³

While the definition of Green Attributes in the Standard Terms and Conditions is imperfect, CRS and SMUD do not think it implies that RECs are exclusive of environmental attributes – the various environmental attributes may be separately enumerated in the definition merely to avoid any doubt that they must be included with the REC, rather than to imply they are exclusive of a REC. We believe this is the best interpretation of the Green Attributes definition, considering canons of construction requiring ambiguities in a rule or statute to be resolved in a manner that avoids nullification of the rule or statute.

Regardless, the Commission's Green Attributes definition cannot overrule the requirement of the RPS statute, that RECs include all environmental attributes associated with the production of electricity from eligible renewable energy resources, including GHG emissions avoided through the displacement of conventionally generated electricity. To the extent that the Commission's Green attributes definition is inconsistent with the RPS statute, it must be disregarded.²⁴

²² It is ironic that the Commission's attempt to correct a perceived inconsistency with the language of SB 107 created another, more glaring inconsistency.

²³ We recognize, however, that this may not be the appropriate venue to raise this concern.

²⁴ See *Morris v. Williams* (1967) 67 Cal.2d 733, 748 ("Administrative regulations that alter or amend the statute or enlarge or impair its scope are void.")

IV. Proposed definition

CRS and SMUD submit the following definition for RECs, which we believe is consistent with the definition of RECs under the RPS statute, and may address some of the concerns addressed by parties to this proceeding:

A “Renewable Energy Credit” is a certificate of proof, issued through the Western Renewable Energy Generation Information System, or its successor registry, that one megawatt hour of electricity was generated and delivered by an eligible renewable energy resource as defined under the laws, rules, regulations or applicable administrative decisions of the State of California. A Renewable Energy Credit shall include all renewable and environmental attributes associated with the production of electricity from the eligible renewable energy resource, including any emissions benefit associated with the displacement of fossil fuel energy use on the electricity grid, except for (1) any separate emissions reduction credits issued pursuant to Section 40709 of the Health and Safety Code; (2) any credits or payments associated with the reduction of solid waste and treatment benefits created by the utilization of biomass or biogas fuels; and (3) any tradable credits, offsets, or allowances associated with the avoided methane emissions associated with biomass or biogas fuels.

This definition contains the essential language of CPUC § 399.12(h)(2), that RECs include all environmental attributes, and specifies this includes any emissions benefit associated with the displacement of fossil fuel energy use on the electricity grid. It also clarifies that avoided methane emissions associated with biomass or biogas are not included in a REC.

On this last point, we agree with the position expressed by a majority of parties to this proceeding, that the Legislature did not intend for avoided methane emissions associated with the capture of biogas to be included in a REC. We note that parties contracting for the sale of RECs from biomass generation facilities routinely include only the environmental attributes associated with the displacement of conventional energy

generation, and not avoided emissions resulting from the conversion of methane into less GHG detrimental gases such as CO₂ (*e.g.* through flaring). Furthermore, the “Environmental Attributes” definition in place when SB 107 was enacted, and expressly referenced in SB 107 as originally proposed, refers to environmental attributes “attributable to the generation for Unit(s), and its displacement of conventional energy generation.” D. 04-06-014. Although SB 107 is somewhat ambiguous on this point, we believe the most reasonable interpretation in light of industry norms and D.04-06-014 is that the Legislature did not intend to require RPS compliant RECs to include any tradable credits, offsets, or allowances associated with the avoided methane emissions associated with biomass or biogas fuels.

V. Conclusion

CRS and SMUD thank the Commission in advance for allowing us to augment the record in this proceeding to address what we believe are critical legal issues that have been largely overlooked up to this point. The plain language of the RPS statute requires that the Commission define RECs to include environmental and avoided emissions attributes of renewable energy generation. Disaggregating environmental and avoided emissions attributes from RECs would destroy the intended environmental benefit of the RPS, which would compound CARB’s task to the point that it might be impossible to comply with the mandate of AB 32. We support the Commission’s efforts to facilitate the use of tradable RECs for RPS compliance, and encourage the Commission to adopt a definition of RECs that is consistent with the text, intent, spirit and purpose of the RPS statute, and preserves the intended environmental benefit of the RPS program.

DATED: May 29, 2008

Respectfully submitted,

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By: /S/
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CERTIFICATE OF SERVICE

I, Galen Lemei, certify under penalty of perjury under the laws of the State of California that the following is true and correct:

On this May 29, 2008, I caused a true copy of the foregoing

**COMMENTS FILED BY THE CENTER FOR RESOURCE SOLUTIONS
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to be served on all known parties to R0602012, R0603004, R0604009, and R0605027 listed on the most recently updated service list available on the California Public Utilities Commission website, via email to those listed with email addresses and via US mail to those without.

Executed this 29th Day of May, 2008, in San Francisco, California.

_____/S/_____
GALEN LEMEI

R06-02-012, R06-05-027, and R.06-04-009
Electronic Service Lists
March 28, 2008

R.06-02-012

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